

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KRISTINA MIDDLETON, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

PROSMILE HOLDINGS, LLC,

Defendant.

Case No. 3:24-cv-00533-RK-TJB

**NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT AGREEMENT**

PLEASE TAKE NOTICE that on April 21, 2025, Plaintiff Kristina Middleton, by counsel, shall move under Rule 23 of the Federal Rules of Civil Procedure, for entry of the proposed Preliminary Approval Order that, among other things, will, (1) certify the Settlement Class for settlement purposes only; (2) appoint Laukaitis Law as Settlement Class Counsel; (3) appoint Plaintiff as Class Representative; (4) approve the accompanying Claim Form, Short Form Notice, and Long Form Notice; and (5) appoint Simpluris Inc. as the Settlement Administrator.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, the undersigned intend to rely on the accompanying Memorandum of Law and supporting declaration of Kevin Laukaitis.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Federal Rules of Civil Procedure, a proposed form of Order is attached.

Dated: March 17, 2025

Respectfully submitted,

By: /s/ Kevin Laukaitis
LAUKAITIS LAW LLC
Kevin Laukaitis (NJ ID 155742022)
Daniel Tomascik*
Natalia Perez*
954 Avenida Ponce De Leon
Suite 205, #10518
San Juan, PR 00907
T: (215) 789-4462
klaukaitis@laukaitislaw.com
dtomascik@laukaitislaw.com
nperez@laukaitislaw.com

Attorneys for Plaintiff

*Admitted Pro Hac Vice